

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

BOB BAFFERT,	)	
<i>Plaintiff</i>	)	
	)	
v.	)	Case No. 1:21-cv-3329 (CBA)
	)	
THE NEW YORK RACING	)	
ASSOCIATION, INC.,	)	
<i>Defendant</i>	)	

**NOTICE OF MOTION TO HOLD NYRA IN CIVIL CONTEMPT AND TO STAY  
NYRA'S RENEWED SUSPENSION PROCEEDINGS**

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law, Plaintiff, Bob Baffert ("Baffert"), will move the Court, at the United States Courthouse, 25 Cadman Plaza East, Brooklyn, New York 10021, as soon as counsel may be heard, for an order holding the Defendant, The New York Racing Association, Inc. ("NYRA"), in civil contempt for failure to comply with the terms of the Court's July 14, 2021 Memorandum & Order enjoining it from enforcing its unlawful suspension of Baffert from New York racetracks. Additionally, Baffert seeks an Order from this Court staying NYRA's renewed attempt to suspend him.

Dated: New York, New York  
September 22, 2021

Respectfully submitted,

Charles Michael  
Steptoe & Johnson LLP  
1114 Avenue of the Americas  
New York, New York 10036  
cmichael@steptoe.com

Clark O. Brewster  
BREWSTER & DEANGELIS  
2617 E. 21st  
Tulsa, Oklahoma 74114

/s/W. Craig Robertson, III  
W. Craig Robertson III  
WYATT, TARRANT & COMBS, LLP  
250 West Main Street, Suite 1600  
Lexington, Kentucky 40507-1746  
859.233.2012  
[wrobertson@wyattfirm.com](mailto:wrobertson@wyattfirm.com)  
(admitted *pro hac vice*)

*Counsel for Plaintiff, Bob Baffert*